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Attorneys for Plaintiffs and the Class

[Additional Counsel Listed on Signature Page]

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MEGAN SCHMITT, DEANA
REILLY, CAROL ORLOWSKY, and
STEPHANIE MILLER BRUN,
individually and on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

YOUNIQUE, LLC,

Defendant.

Case No. 8:17-cv-01397-JVS-JDE

**APPLICATION FOR LEAVE TO FILE
UNDER SEAL EXHIBITS TO
PLAINTIFFS' *EX PARTE*
APPLICATION TO STAY THE CASE
AND MOTION FOR DISCOVERY
SANCTIONS**

Complaint Filed: 8/17/17

Trial Date: 2/19/19

Pursuant to Local Rule 79-5, Plaintiffs Megan Schmitt, Deana Reilly, Carol Orlowsky, and Stephanie Miller Brun request leave of the Court to file redacted versions of the July 27, 2018 deposition transcripts of Defendant Younique's designated 30(b)(6) witnesses, Robert Phillips and Vrena Ranallo as exhibits in support of Plaintiff's *Ex Parte* Application to Stay the Case and Motion for Discovery Sanctions. Those transcripts are annexed to the Declaration of Adam Gonnelli in support of Plaintiff's *Ex Parte* Application to Stay the Case and Motion for Discovery Sanctions as Exhibits 3 and 4.

Pursuant to Local Rule 79-5.1, a person seeking to have a case or document sealed must follow the procedures of Local Rule 79-5.2 seeking approval of the Court prior to submitting documents under seal. The Parties stipulated and the Court entered a protective order in this case which permits materials disclosed by the Parties in the course of litigation to be designated as confidential [Dkt. 64] and for such confidential materials to be filed in compliance with Local Rule 79-5.1. Defendant Younique has designated the transcripts of the July 27, 2018 deposition transcripts of its 30(b)(6) witnesses, Robert Phillips and Vrena Ranallo as confidential.

Relief Requested

Plaintiffs respectfully request the Court grant their application for Leave to File Under Seal to permit Plaintiffs to file the deposition transcripts of Defendant's 30(b)(6) witnesses.

Dated: July 31, 2018

NYE, PEABODY, STIRLING, HALE &
MILLER, LLP

By: /s/

Jonathan D. Miller, Esq.
Alison M. Bernal, Esq.

[Signatures continued on following page.]

1 Dated: July 31, 2018

CARLSON LYNCH SWEET
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2 By: /s/
3 Ed Kilpela, Esq.

4 Dated: July 31, 2018

THE SULTZER LAW GROUP P.C.

5 By: /s/
6 Adam Gonnelli, Esq.

7
8
9 Dated: July 31, 2018

WALSH, LLC

10 By: /s/
11 Bonner Walsh, Esq.

12
13 *Attorneys for Plaintiffs and the Class*